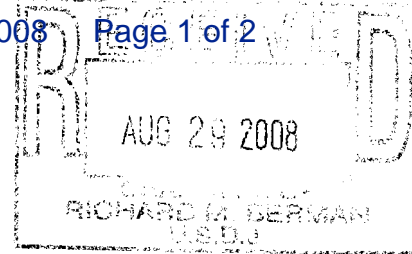


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MEMO ENDORSED

KIRK M. LYONS
E-Mail: klyons@lyons-flood.com

ADMITTED: NEW YORK,
CONNECTICUT, NEW JERSEY,
& MASSACHUSETTS

BY MESSENGER

Honorable Richard M. Berman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

August 29, 2008

Application denied. Step on the
gas.

SO ORDERED:
Date: 8/29/08

Richard M. Berman
Richard M. Berman, U.S.D.J.

Re: Countinho & Ferrostaal, Inc., *et al.* v. GETALDIC, *et al.*
08 Civ. 4820 (RBM) (FM)
Our File: 2563042

Dear Judge Berman:

We are attorneys for defendants Atlant Panamax Corp. and Atlanska Plovidba DD in this action.

On behalf of plaintiffs and defendants, we respectfully request that the initial pre-trial conference, which is currently scheduled for September 2, 2008, at 9:00 a.m., be adjourned for an additional sixty (60) days.

This is the second request for an adjournment of the initial pre-trial conference. We have conferred with plaintiffs' attorney and plaintiffs' consent to the adjournment. The reason for the second adjournment is to allow additional time for co-defendant Daewoo Logistics Corp. to appear in the action.

We thank you for your attention to this matter.

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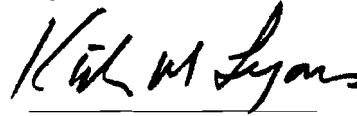
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Respectfully yours,

Lyons & Flood, LLP

By:



Kirk M. Lyons

BY TELEFAX

cc: Kingsley Kingsley & Calkins
91 West Cherry Street
Hicksville, NY 11801

(516) 931-4313

Attn: Steven P. Calkins, Esq.

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